

**United States District Court**  
NORTHERN DISTRICT OF GEORGIA

UNITED STATES OF AMERICA

v.

BILLY CALHOUN

Date: Jan 13 2021

JAMES N. HATTEN, Clerk

By: s/Mariya Davis  
Deputy Clerk**CRIMINAL COMPLAINT**

Case Number: 1:21-MJ-0033

I, the undersigned complainant being duly sworn, state the following is true and correct to the best of my knowledge and belief. Beginning by at least August 2019 and continuing until February 2020 in Cobb County, in the Northern District of Georgia and elsewhere, defendant did: (a) produce and attempt to produce child pornography; (b) receive child pornography; and (c) possess child pornography,

in violation of Title 18, United States Code, Sections 2251(a), 2252(a)(2), and 2252(a)(4)(B).

I further state that I am a Special Agent with the FBI and that this complaint is based on the following facts:

PLEASE SEE ATTACHED AFFIDAVIT

Continued on the attached sheet and made a part hereof. Yes

*T. Dervish*

\_\_\_\_\_  
Signature of Complainant  
Taylor Dervish

Based upon this complaint, this Court finds that there is probable cause to believe that an offense has been committed and that the defendant has committed it. Sworn to me by telephone pursuant to Federal Rule of Criminal Procedure 4.1.

January 13, 2021

Date

at Atlanta, Georgia

City and State

JOHN K. LARKINS III

UNITED STATES MAGISTRATE JUDGE

Name and Title of Judicial Officer

AUSA Alex R. Sistla / Katie Terry / 2020R00845

*John K. Larkins III*  
\_\_\_\_\_  
Signature of Judicial Officer

**ATTEST: A TRUE COPY  
CERTIFIED THIS**

Date: Jan 13 2021

JAMES N. HATTEN, Clerk

By: s/Mariya Davis  
Deputy Clerk

**AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT**

I, Taylor Michelle Dervish, depose and say under penalty of perjury:

**INTRODUCTION**

1) I make this affidavit in support of a Criminal Complaint against **BILLY CALHOUN**, a 29-year-old male, for the production and attempted production of child pornography, in violation of 18 U.S.C. § 2251(a) & (e), and receipt of child pornography, in violation of 18 U.S.C. § 2252(a)(2) & (b)(1), and possession of child pornography, in violation of 18 U.S.C. § 2252(a)(4)(B) & (b)(2).

2) Based on the investigation to date, there is probable cause to believe that **CALHOUN** in the Northern District of Georgia and elsewhere knowingly persuaded, induced, enticed, or coerced at least five minor females: A.C., J.T., K.K., A.J., and C.B., to engage in sexually explicit conduct, for the purpose of producing and attempting to produce, a visual depiction of such conduct, in violation of 18 U.S.C. § 2251(a). In addition, as detailed below, there is probable cause that in the Northern District of Georgia, **CALHOUN** also received child pornography, in violation of 18 U.S.C. § 2252(a)(2) (including but not limited to the images and videos he received online from multiple minor victims), and possessed child pornography, in violation of 18 U.S.C. § 2252(a)(4)(B).

3) I am a Special Agent with the Federal Bureau of Investigation and have been so employed since June 2014. I am currently assigned to the Atlanta field office, where I investigate Violent Crimes Against Children (VCAC). I have participated in multiple criminal investigations related to child exploitation and child sexual abuse material including violations pertaining to the illegal production, distribution, receipt and possession of child sexual abuse material/child pornography. I have received training in the area of child sexual abuse material

and child exploitation and have had the opportunity to observe and review examples of child sexual abuse material (*i.e.*, child pornography, as defined in 18 U.S.C. § 2256). As a federal agent, I am authorized to investigate violations of laws of the United States and to execute warrants issued under the authority of the United States.

4) The statements in this affidavit are based primarily upon my knowledge of the matter as well as information provided by other law enforcement officers. Since this affidavit is being submitted for the limited purpose of securing a complaint and arrest warrant, I have not included every fact known to me concerning this investigation; rather, I have set forth only the facts necessary to establish probable cause.

### **PROBABLE CAUSE IN SUPPORT OF CRIMINAL COMPLAINT**

#### **Production of Child Sexual Abuse Material Depicting A.C.**

5) On February 6, 2020, Cobb County Police Department (CCPD) responded to Cooper Middle School in Cobb County, Georgia, in the Northern District of Georgia, in response to the alleged exploitation of a minor. CCPD was advised that an older male brought lunch to 14-year-old female, “A.C. A.C. told the Middle School administrators that the older male was her boyfriend’s uncle.

6) A.C. told school administrators that her boyfriend’s name was “Zack.” A.C. met Zack on Instagram in or around October 2019. A.C. had never met Zack in person (or even seen him) but communicated with him via text message and FaceTime calls. A.C. explained that during the FaceTime call, Zack would not show his face because he said that his camera was broken.

7) A.C. also told administrators that Zack bought her gifts, including her then-current cell phone and two laptops. A.C. stated that she and Zack had phone sex and sent nude pictures

to each other. School administrators contacted CCPD and conveyed this information given to them by A.C.

8) A.C.'s mother told CCPD that she knew A.C. was communicating with a 16-year-old boy named Zack. A.C.'s mother had never met Zack. A.C.'s mother stated that gifts for A.C. were sent to their residence in Powder Springs, Georgia via Amazon, and the packaging label listed the recipient's address as **BILLY CALHOUN**, 109 Oak Pointe Ct. Acworth, GA 30102.

9) On February 12, 2020, CCPD opened an investigation into **CALHOUN**.

10) On February 25, 2020, **CALHOUN** picked A.C. up at Cooper Middle School without her mother's permission. Later that same day, **CALHOUN** was arrested on state charges of interference of custody and contributing to the delinquency of a minor.

11) Following his arrest, CCPD Detectives Bryan Bridges and Brandon Johnson, and Sgt, Hunter Lllewellyn interviewed **CALHOUN** at CCPD Headquarters. The interview was video recorded. The detectives orally advised **CALHOUN** of his *Miranda* rights, which **CALHOUN** stated he understood. **CALHOUN** also executed a *Miranda* waiver form. **CALHOUN** stated that he had gone to A.C.'s house every week for the past month. **CALHOUN** stated that he had a key and had been in the house when no one was home. **CALHOUN** stated that he bought A.C. four or five tablets and an iPhone.

12) **CALHOUN** stated that he was "Zack" and he made up a persona to talk to A.C. because he was actually 28 years old. A.C. told **CALHOUN** that she was 14 years old, so he said he was 16 years old. **CALHOUN** stated that he got the pictures of "Zack" from the Internet.

13) **CALHOUN** advised that he had been talking to A.C. for approximately five months, and initially they communicated via Snapchat before moving to Instagram, FaceTime, and texting to communicate. **CALHOUN** stated he knew that A.C. was 14 years old. **CALHOUN**

stated that he and A.C. had sexually explicit conversations. **CALHOUN** stated that A.C. sent him videos of her engaging in sexually explicit acts, some of which were still on his phone.

**CALHOUN** claimed that he had deleted most of the videos A.C. sent to him.

14) A few days earlier, on February 20, 2020, CCPD Detectives took custody of an iPhone belonging to A.C. and placed it into evidence with a request for the High Tech unit to process the device. On February 25, 2020, CCPD reviewed the results of the forensic examination of A.C.'s cell phone. Among other items, CCPD noted sexually explicit text messages from "Zack.". Sexually explicit videos of A.C. were also found on A.C.'s cell phone.

15) On February 25, 2020, CCPD obtained a separate arrest warrant for **CALHOUN** charging him with six counts of Sexual Exploitation of a Child, in violation of Georgia State Code 16-12-100. In addition, CCPD obtained a state search warrant for two cellular phones that **CALHOUN** had on him at the time of his arrest. **CALHOUN** admitted during his post-*Miranda* interview that he used one of the phones to communicate with A.C.<sup>1</sup>

16) On February 28, 2020, A.C. was interviewed forensically at Safepath in Marietta, Georgia. A.C. In relevant part, A.C. provided the following information:

- a) A.C. started dating "Zachary Thomas Black" on October 28, 2019 after meeting him on Instagram.
- b) Zack has an uncle named "Billy" who brings gifts to A.C. because Zack cannot drive.
- c) A.C. has received from Zack (through "Billy") a ring, an iPhone 11, a necklace, two computers, an iPad, a Kindle, another small tablet, and food.

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<sup>1</sup> **CALHOUN** specifically identified his One Plus GM1915 cellular phone as the one that contained his communications with A.C. Based on an online search about this cell phone model, your Affiant has learned that the One Plus GM 1915 is one of the One Plus 7 Pro models, an Android-based smartphone manufactured in China by One Plus. As detailed below, I subsequently reviewed the contents of this cellular phone and identified additional minor victims.

d) A.C. sent nude photos and videos to “Zack” and she used FaceTime to have sexually explicit conversations, during which she was nude or engaged in other sexually explicit conduct, including masturbating together with Zack.

17) On March 4, 2020, CCPD obtained a state search warrant for **CALHOUN’s** residence, 109 Oak Pointe Ct. Acworth, Georgia 30102, in the Northern District of Georgia. During the execution of the warrant, CCPD seized multiple electronic devices, including cell phones, computers, hard drives, SD cards, thumb drives, as well as children’s underwear and explicit photos and drawings.

**Review of Calhoun’s Cell Phone in Reference to Minor Female A.C.**

18) On April 13, 2020, your affiant reviewed the contents of one of **CALHOUN’s** cell phone—the One Plus GM1915—seized from him at the time of his arrest. In relevant part, I found the following of evidentiary significance:

a) There were approximately 107 images of A.C. These images were screen shots from recorded videos during which A.C. was masturbating. A.C. was in various states of undress in the images. In multiple images, A.C. is inserting items into her vagina. In approximately 26 images, the focus is on A.C.’s vagina.

b) There were seven videos that had been produced between approximately January 11 and January 19, 2020, featuring A.C. engaged in various sexually explicit conduct, including the following files:

i. *20-01-11-08-31-28.mp4* – is an approximately four minute and 31 second recording of a video chat in which A.C. is inserts a dildo into her vagina and anus. A male voice, I believe to be that of **CALHOUN**, can be heard directing A.C. on what he wants to see her do. **CALHOUN** can also be heard moaning.

ii. *20-01-11-16-23-23-01.mp4* – is an approximately one minute and 52 second recording of a video chat set to music in which A.C. is inserting her fingers into her vagina. There are two additional video files depicting the same activity, one of which has the same filename, but is longer and in which A.C.’s face is visible at the end, and a second that lacks music but in which **CALHOUN**’s voice can be heard.

iii. *20-01-11-16-40-25.mp4* – is an approximately four minute and 24 second recording of a video chat in which A.C. is inserting a pink dildo into her vagina and **CALHOUN** can be heard directing her actions and moaning. A.C.’s face is visible in the recording.

iv. *20-01-11-16-45-05.mp4* – is an approximately one minute and 51 second recording of a video chat in which A.C. sucks on a pink dildo then inserts it in her vagina. **CALHOUN** can be heard moaning and calling A.C. his “little girl.” A.C.’s face is visible in the recording.

19) In each of the videos described above, A.C. appears to be in same bedroom, and in three of the four videos, A.C.’s face is visible.

20) Based on my training experience, I believe that the images and videos described above meets the definition of child sexual abuse material (*i.e.*, child pornography) as defined under federal law (18 U.S.C. § 2256). As detailed below, during my review of **CALHOUN**’s cellular phone (a One Plus Model GM1915), I identified four additional minor females who sent nude videos and/or photos to **CALHOUN** (or in the case of one minor female **CALHOUN** solicited such videos and/or photos). The review reveals that **CALHOUN** has communicated with and received nude videos and/or photos from dozens of minor females he met online, but

they have yet to be identified.

**Production of Child Sexual Abuse Material Depicting Minor Female J.T.**

21) During your affiant's review of CALHOUN'S One Plus Model GM1915 cell phone, I identified a second minor female victim, J.T., a 16-year-old female residing in Union, South Carolina. I identified approximately 60 digital images and nine videos of J.T. that constitute child sexual abuse material under federal law (further described below).

22) On December 7, 2020, FBI Child/Adolescent Forensic Interviewer (CAFI) Shannon Martucci interviewed J.T. in Spartanburg, South Carolina. In relevant part, J.T. stated:

- a) J.T. met "Zack", who she believed to be 15 or 16 years old, in an online chat room in February 2020. On the same day they met, J.T. and Zack began communicating on Snapchat and Instagram. J.T. told Zack that she was 16 years old. Zack asked J.T. to send her nude pictures on that first day. J.T. stated that she never saw Zack.
- b) J.T. communicated with the person she believed to be Zack multiple times a day for approximately a month. Zack would instruct J.T. what to do when they were live video chatting. Zack asked J.T. to show him her breasts, vagina and anus. During at least one of their conversations, Zack instructed J.T. to find something to insert into her vagina. Zack would take screen shots while J.T. performed these acts. J.T. stated that she knew Zack took screen shots because he sent her a compilation of the images.
- c) J.T. stated that Zack made her uncomfortable; he told J.T. that he wanted to tie her up and rape her.

23) During the interview, J.T. was also shown five different images that had been recovered from CALHOUN's cellular phone. J.T. identified herself in each image and stated that she either sent the image to Zack or he took a screenshot during their video chats. A



description of the five images shown to J.T. are as follows:

a) *Screenshot\_20200218-095711.jpg* – J.T. is laying on the bed completely nude and the focus of the image is on her vagina.

b) *Screenshot\_20200223-142203.jpg* – J.T. has the words “daddy” and “Zack” written on her breasts.

c) *Screenshot\_20200223-110802.jpg* – J.T. has the words “daddy” and “Zack” written on her vagina.

d) *Screenshot\_20200222-160726* and *Screenshot\_20200217-233436* do not constitute child pornography, but depicted, respectively, J.T. wearing purple underwear and J.T.’s face while she is sitting on a bed with her breasts exposed.

24) In the images in which J.T. wrote on her body, J.T. stated that Zack instructed her to do so. Based on my training and experience, I believe that each of the images described in Paragraph 23(a)-(c) qualifies as child sexual abuse material (*i.e.*, child pornography) under federal law (18 U.S.C. § 2256).

**Review of Calhoun’s One Plus Model GM1915 Cell Phone in Reference to J.T.**

25) During my April 13, 2020 review of **CALHOUN’s** cellular phone, I found, among other items, the following of evidentiary significance in connection with J.T., including digital images and videos that qualify as child pornography under federal law (18 U.S.C. § 2256):

a) In his electronic calendar on this cell phone, **CALHOUN** notated that he “Met JT” on February 16, 2020.

b) There were approximately 20 files containing images of J.T. that constitute child pornography, including multiple images focused on J.T.’s vagina and anus and images of a hairbrush inserted into J.T.’s vagina. These images were saved in **CALHOUN’S** One

Plus Model GM1915 cell phone, under file path; Pictures/My Collections/ J.T. the images were all saved in February 2020.

c) There were multiple videos that had been produced on or around February 17, 2020 featuring J.T. engaged in various sexually explicit conduct, including the following files:

(i) Six videos, labeled Snapchat with nine or ten digits following each video name, each of which focused on J.T.'s vagina as she masturbated with a hairbrush.

(ii) *20-02-19-08-47-01.mp4* – this is an approximate 26 second video that is a screen recording in which **CALHOUN** scrolls through a picture gallery labeled in J.T.'s name. The video begins by showing images of J.T.'s face, followed by images of J.T.'s vagina, and then images of J.T. inserting a hairbrush into her vagina.

(iii) *20-02-22-16-12-07\_01.mp4* – this is an approximate 18 second video in which J.T. is seen on the top of the screen and a still picture of the Zack persona is on the bottom.<sup>2</sup> The camera is on J.T.'s face while she is masturbating. **CALHOUN** can be heard moaning.

**Enticement to Produce Child Sexual Abuse Material Depicting Minor Female K.K.**

26) K.K. is a 13-year-old female residing in Leland, North Carolina.

27) In or about February 2020, K.K.'s mother learned that KK was talking to someone who K.K. believed to be a 15- or 16-year-old male. K.K.'s mother became suspicious and saw messages on K.K.'s phone that raised concerns. K.K.'s mother then contacted the Brunswick County Sheriff's Office (BCSO) in North Carolina.

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<sup>2</sup> The "Zack" persona looked like to be of a 15- or 16-year-old-male, with dark hair and a skinny build.

28) On February 18, 2020, a Forensic Interviewer from the Carousel Center in North Carolina conducted a forensic interview with K.K., who stated in relevant part the following:

- a) K.K. been communicating with a 28-year-old man, who, at the time, she believed to be a teenage boy named “William.” Around Labor Day of 2019, K.K. was on Chat Avenue.<sup>3</sup> K.K. identified herself as 13-year-old female from North Carolina on Chat Avenue. K.K. said that she received a private chat from someone she did not know who identified himself as “William,” a 15-year-old male from Georgia. This person asked for K.K. for her Snapchat username, K.K. provided “William” her username, and they started communicating on Snapchat. K.K. and “William” communicated for several weeks.
- b) “William” demanded K.K. take and send pictures. Among the pictures “William” demanded were:
  - (i) what K.K. was wearing every day
  - (ii) K.K.’s feet because “William” had a foot fetish.
  - (iii) K.K. wearing a bra
  - (iv) K.K.’s stomach.
- c) K.K. sent several pictures of herself from her bathroom wearing a bra. “William” told K.K. that she only sent pictures of her in her bra and said he wanted to see her “tits.” “William” told K.K. that he would kill himself if she refused because that meant that she did not love him. In response, K.K. sent a picture of her breasts. “William” wanted K.K.’s face to be in the picture, so K.K. sent a picture with her face. “William” asked

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<sup>3</sup> Chat Avenue is a live chatting website where users can join one of 19 different chat rooms based on interest. Users can create an account or log in as a guest. All of the chat rooms are free to join. Rooms include some of the following categories: College, Adult, Singles, Dating, General, Teens, Kids, Gay, Video Games, Boys, Mobile, Cam and Live.

K.K. if she was really 13 years old because her breasts were so big.

d) “William” also asked K.K. to send him videos of her feet and make her call him “Daddy.” “William” would tell her what he wanted her to do in the videos. KK sent approximately two videos of her wiggling her toes.

e) “William” kept asking K.K. to send him her address. K.K. eventually sent “William” both her mother’s and father’s addresses in North Carolina. Among the items “William” sent to K.K were chap stick, \$80, a card, Vans shoes and a diamond necklace.

f) “William” called K.K. and try to have phone sex. K.K. pretended to rub herself. “William” sent K.K. recordings of him moaning via Snapchat and Skype. “William” wanted K.K. to moan for him.

g) “William” sent videos of males masturbating and said they were videos of him.<sup>4</sup>

h) “William” told K.K. that his sister had a crush on K.K., and she masturbated to pictures of K.K. “William” sent K.K. a picture of a young-looking girl in a bra and underwear, and another of the same girl without a bra on.

i) K.K. felt like she could not break it off with “William” because he had her address and pictures. “William” told K.K. that he could do anything he wanted because he had her address. When K.K. tried to break up with “William,” he told K.K. he had a gun to his head and he was going to kill himself. On another occasion “William” told K.K. that he was going to sell her photos on the Internet.

29) During your affiant’s review of **CALHOUN**’s One Plus Model GM1915 cell phone, I located screenshots of some of the text exchanges via text and Snapchat that were exchanged

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<sup>4</sup> Because these videos did not include the males’ faces, it is not possible to estimate the age of the males depicted in these videos.

between K.K. and CALHOUN. K.K. refers to CALHOUN as “William” in these exchanges.

30) CALHOUN communicated with K.K. between approximately September 2019 and October 2019. The screen shots of their text message exchanges documented numerous conversations that were sexually explicit. By way of example, the following are three examples of such sexually explicit text exchanges between K.K. and CALHOUN:

a) *Screenshot\_20191019-104745\_01.jpg* – CALHOUN says, “Is my Little girl horny,” and then messages, “My little princess want me to bend her over and stick it up her butt.” K.K. responds, “Yes daddy.” CALHOUN replies, “Every last inch.” K.K. then replies, “Of course daddy,” to which CALHOUN responds, “Tell Daddy what you want him to do to you dirty feet.”

b) *Screenshot\_20191019-104809.jpg* – CALHOUN writes, “Does my little girl want a baby.” K.K. responds, “Yes daddy. Only your baby’s daddy all your babies”.

CALHOUN replies, “Daddy to get you pregnant right now,” followed by “You want to sit on Daddy’s face” and “Cum all in his mouth.” K.K. responds, “Of course daddy”.

c) *Screenshot\_20191020-172808.jpg* – CALHOUN writes, “Daddy will shatter your in little innocents. Daddy fuck you hard hard extremely very hard. Daddy will grab your waist he’s going to fuck you so hard really deep.”

31) The images of K.K. on CALHOUN’s phone depicted her in various stages of undress, including approximately seven in which she is topless, and her breasts are visible.

**Production of Child Sexual Abuse Material Depicting Minor Female C.B.**

32) During the CALHOUN’s interview, he also stated that he talked to a 15-year-old named “C.B.”. CALHOUN stated that they exchanged sexually explicit images and videos.

33) During my review of CALHOUN’s cell phone and the contents of a thumb drive

(labeled “USB30FD (PNY)”)<sup>5</sup> I found approximately 38 images and 18 videos of C.B., a 15-year-old female, who resides in Morrow, Georgia. **CALHOUN** and C.B. communicated from between approximately August and December 2019.

34) C.B. was identified through the review of **CALHOUN’S** cell phone. There was a picture of C.B.’s face in **CALHOUN’S** contacts. I compared that picture with images of C.B. found on **CALHOUN’S** thumb drive, and I believe it to be the same minor female C.B. who I observed in multiple images and videos (described in Paragraph 35).

35) The images and videos of C.B. were contained in three separate folders on the thumb drive. The majority of the videos and images described below qualify as child pornography under 18 U.S.C. § 2256.<sup>6</sup>

a) *Folder One*: This folder contained three videos and 18 images. Two of the three videos depicted (and focused on) C.B. masturbating while she inserted her fingers into her vagina. The third video showed C.B.’s feet. Twelve of the eighteen images were showed (and often focused on) either C.B.’s vagina or anus.

b) *Folder Two*: This folder contained 15 videos. In eleven videos, the focus is on C.B.’s vagina as she inserts her fingers and/or “touches herself.” One video depicts C.B. using a dildo to masturbate. The remaining three videos show C.B. wiggling her toes.

c) *Folder Three*: This folder contained 20 images, of which multiple images were focused on C.B.’s vagina, including one image that focused on both her vagina and anus and another (labeled “Guess what’s in me Daddy”) that showed C.B.’s vagina with dildo inserted.

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<sup>5</sup> This thumb drive was recovered during the March 4, 2020 search of **CALHOUN’S** residence.

<sup>6</sup> Because the folder name identifies the minor victim, at least in part, I am referring to them generically as “Folder One,” “Folder Two,” and “Folder Three.”

Another six images were full body shots of C.B. while standing nude in front of a mirror or in the shower.

36) Your affiant briefly interviewed C.B. on January 7, 2021 and a forensic interview is pending. C.B. told me that she is currently 16 years old and that last year she communicated with someone she knew as “William” online and sent him nude photos and videos.

37) Your affiant knows that “William” is another persona used by **CALHOUN**. “William” was the persona **CALHOUN** used to communicate with K.K.

**Production of Child Sexual Abuse Material Depicting Minor Female A.J.**

38) During my review of **CALHOUN**’s One Plus GM1915 cell phone, I located one image and one video of a fifth minor female – later tentatively identified as A.J. – in a folder entitled “My Collections.” The image—taken from above—showed A.J.’s vagina (the angle of the photo is indicative of A.J. taking the photo). In the video, which is approximately 28 seconds long, A.J. pulls her pants down and touches her vagina with her hand. A.J.’s face is visible at the end of the video. Based on the file name of the video, *20-02-15-15-01-03\_01.mp4*, and that of the digital image, *screenshot\_20200215-182804.jpg*, A.J. sent the image and video via Instagram on February 15, 2020. Both the image and video show A.J.’s Instagram username in the top left-hand corner.

39) Law enforcement have tentatively identified A.J. based on a subpoena submitted to Instagram for the username that is visible on the image and video files described in the previous paragraph. A.J. has not yet been located or interviewed but based on my review of the image and video and my training and experience, A.J. appears to be approximately 15 or 16 years old. The subscriber information received from Instagram indicates that A.J. resides in Illinois.

### **Unidentified Victims**

40) Based on my ongoing review of the evidence collected in this investigation, CALHOUN was in contact with numerous other minor females (including receiving nude photos and videos). To date, law enforcement has neither identified nor located these additional potential victims.

### **Possession of Child Sexual Abuse Material/Child Pornography**

41) As noted above, CCPD executed a state search warrant at CALHOUN's residence on March 4, 2020. During the warrant law enforcement recovered multiple electronic devices on which child pornography was found, which is briefly summarized below.

a) Electronic Device: Removeable Disk (E) (SanDisk Ultra Plus)

i) In two folders (001 and alittleofall), approximately 120 images were observed that qualify as child pornography or child erotica under federal law. The images depicted female children ranging from toddlers to teenagers. By way of example, these are four files that were reviewed on this device:

(1) *Incest-Captions-19-(Father-Daughter)-3.jpg* – Naked teenage girl sitting on top of a male with is penis between her legs.

(2) *Teen\_And\_PreTeen\_Girls\_JailBait\_Pictures\_10\_2813529.jpg* – Pre-teen girls standing in front of the camera wearing white underwear.

(3) *Cheerleader-bent-over.jpg* – Young looking girl bent over with vagina and anus visible.

(4) *Virgin\_off\_113\_009.jpg* – Three young looking girls, naked in bed, kissing.

b) Electronic Device: Store N Go

i) In seven folders (001, 0010, alittleofall, alittleofall1, anime 002, Captions, and



hottttt), approximately 100 images were observed that qualify as child pornography or child erotica under federal law. In some cases, the same images were found in multiple folders. The images depicted female children ranging from toddlers to teenagers. By way of example, these are nine files that were reviewed on this device.

- (1) *0007.jpg* – pre-teen female with mouth on adult male penis
- (2) *Im-isabel-fucking-9.jpg* – teenage female with male penis inserted in anus
- (3) *962.flv\_preview.jpg* – pre-teen female laying on bed naked with penis in her vagina.
- (4) *Horse-sex-2.jpg* – Teen age female, naked and bent over, with penis of a horse appearing to be inserted inside her.
- (5) *FaKings%20\_%20Karen%201888\_m.Jpg* – pre-teen female laying on bed naked holding the penis of one male, while another is inserting his penis in her vagina.
- (6) *Yui.jpg* – teenage female naked on a bed using her fingers to spread her vagina. There is a caption that reads “Right there daddy right in my fertile fuck hole. I need you to breed me daddy!!” The image also has “wickedincest.com” in the bottom right hand corner.
- (7) *Z040.jpg* – pre-teen female standing naked with her vagina visible and stockings pulled down to her knees. There is a caption that reads “You needed to go to the shop so you asked your daughter to keep your friends entertained. You return, to find her doing a striptease.”
- (8) *Emily Browning (10).Jpg* – naked pre-teen or young teenage girl appearing to be asleep in a bed with an adult male on top of her.
- (9) *128902908628.jpg* –pre-teen female surrounded by adult men who appear to have

ejaculated on her face.

c) Electronic Device: USB Drive (F) (SanDisk)

- i) In five folders (“2019 3”, “2019 4”, “2019 5”, “feet” and “jailbait”), In total, the folders contain approximately 90 images characterized as child sexual abuse material or images of interest/child erotica. Ages of juveniles pictured range from pre-teen to teen.

d) Electronic Device: USB Drive (H) (Sony Memory Stick PRO Duo)

- i) Folder contains two videos characterized as child sexual abuse material. Each video is approximately four minutes long. The female in both videos appears to be a teen. In the first video and adult male in penetrating her with his penis. In the second video, the female and male are performing oral sex on each other.

e) Electronic Device: USB30FD (PNY)

- i) Seventeen folders, labeled with names of victims previously described and additional victims that have yet to be identified. In addition, there are folders containing images considered to be CSAM of known victims and those who have yet to be identified, along with numerous pictures of male penises and videos of a male ejaculating.

### CONCLUSION

42) Based on the foregoing information, I respectfully submit that there is probable cause to believe that **BILLY CALHOUN** produced child pornography, received child pornography, and possessed child pornography in violation of federal law, name:

- a) Between in or about October 2019 until and February 2020, in the Northern District of Georgia, **BILLY CALHOUN** did knowingly persuade, induce, entice, and coerce a minor female, A.C., to engage in sexually explicit conduct, for the purpose of producing

and attempting to produce a visual depiction of such conduct, knowing, and having reason to know, that that such visual depiction would be transported and transmitted using any facility of interstate commerce, and such visual depiction having been produced and transmitted using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce, namely a One Plus cell phone, and such visual depiction actually having been transported and transmitted using any facility of interstate commerce, all in violation of 18 U.S.C. § 2251(a) & (e).

b) In or about February 2020, in the Northern District of Georgia, **BILLY CALHOUN** did knowingly persuade, induce, entice, and coerce a minor female, J.T., to engage in sexually explicit conduct, for the purpose of producing and attempting to produce a visual depiction of such conduct, knowing, and having reason to know, that that such visual depiction would be transported and transmitted using any facility of interstate commerce, and such visual depiction actually having been transported and transmitted using any facility of interstate commerce, all in violation of 18 U.S.C. § 2251(a) & (e).

c) Between in or about October 2019 to December 2019, in the Northern District of Georgia, **BILLY CALHOUN** did knowingly attempt to persuade, induce, entice, and coerce a minor female, K.K., to engage in sexually explicit conduct, for the purpose of producing and attempting to produce a visual depiction of such conduct, knowing, and having reason to know, that that such visual depiction would be transported in interstate commerce, all in violation of 18 U.S.C. § 2251(a) & (e)).

d) Between in or about August 2019 and in or about December 2019, in the Northern District of Georgia, **BILLY CALHOUN**, did knowingly persuade, induce, entice, and coerce a minor female, C.B., to engage in sexually explicit conduct, for the purpose of

producing and attempting to produce a visual depiction of such conduct, knowing, and having reason to know, that that such visual depiction would be transported in interstate commerce, and such visual depiction actually having been transported in interstate commerce, all in violation of 18 U.S.C. § 2251(a) & (e).

e) In or about February 2020, in the Northern District of Georgia, **BILLY CALHOUN** did knowingly persuade, induce, entice, and coerce a minor female, A.J., to engage in sexually explicit conduct, for the purpose of producing and attempting to produce a visual depiction of such conduct, knowing, and having reason to know, that that such visual depiction would be transported and transmitted using any facility of interstate commerce, and such visual depiction having been produced and transmitted using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce, namely a cellular device, and such visual depiction actually having been transported and transmitted using any facility of interstate commerce, all in violation of 18 U.S.C. § 2251(a) & (e).

f) Between in or about October 2019 until continuing in or about February 2020, in the Northern District of Georgia, **BILLY CALHOUN** did knowingly receive, visual depictions, using any means or facility of interstate or foreign commerce, and such visual depictions involved the use of a minor engaging in sexually explicit conduct in violation of 18 U.S.C. § 2252(a)(2) & (b)(1).

g) On February 25, 2020, **BILLY CALHOUN**, did knowingly possesses, or knowingly accesses with intent to view, any visual depiction that has been mailed, or has been shipped or transported using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce, or which was produced using materials

which have been mailed or so shipped or transported, by any means including by computer or cell phone, in which the producing of such visual depiction involved the use of a minor engaging in sexually explicit conduct in violation of 18 U.S.C.

§ 2252(a)(4)(B).